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September 25, 2020

Via ECF

The Honorable Lorna G. Schofield
United States District Judge for the
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Carlos Lara v. Broadway S/S Inc., et al.*
Docket No.: 20-cv-05010 (LGS)

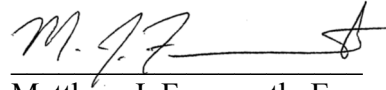
Dear Judge Schofield:

As the Court is aware, this firm represents Plaintiff Carlos Lara in the above-referenced putative collective action alleging wage violations under the Fair Labor Standards Act and the New York Labor Law against Defendants Broadway S/S Inc. and Aftab Hussain, individually. As the Court is further aware, on August 28, 2020, the Court so-ordered a Civil Case Management Plan, setting forth September 25, 2020, as the date for Plaintiff to file his conditional certification motion. We write now, with Defendants' consent, to respectfully request a one-week extension of Plaintiff's deadline to file this motion, extending the deadline from September 25 to October 2, 2020.

The reason for the requested extension is that the Parties have been in discussions to stipulate to conditional certification in lieu of making a motion. However, the Parties have disagreements over the terms of the stipulation, and have been working amicably to resolve them, but have not been able to do so prior to today's filing deadline. We apologize for failing to file this request two-days before the deadline pursuant to Your Honor's Individual Rules, but all Parties believed in good faith that any disagreements could be resolved prior to today's deadline. Therefore, out of an abundance of caution, and in the event that the Parties cannot agree to a stipulation prior to the new deadline above, Plaintiff respectfully proposes to revise the briefing schedule as follows: Opening Brief due October 2, 2020; Opposition Brief due October 16, 2020; and Reply Brief due November 12, 2020. This is Plaintiff's first request for such relief.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

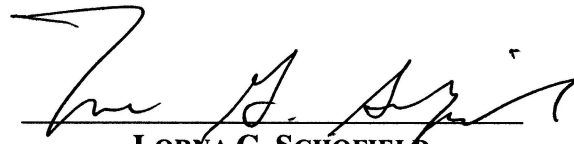

Matthew J. Farnworth, Esq.
For the Firm

To: All counsel *via* ECF

The application is GRANTED in part. By **October 2, 2020**, Plaintiff shall file any conditional certification motion. By **October 16, 2020**, Defendants shall file any opposition, and by **October 23, 2020**, Plaintiff shall file any reply. A conference will be held on **November 12, 2020, at 10:30 a.m.**, for an oral ruling on any conditional certification motion, on the following conference call line: 888-363-4749, access code: 558-3333. The time of the conference is approximate but the parties shall be ready to proceed by that time.

SO ORDERED

Dated: September 28, 2020
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE